



# CITY of WESTMINSTER

May 20, 1992

Public Works and Utilities

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Westminster, Colorado  
80030

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Beth Brainard  
Public Affairs Officer  
U.S. Department of Energy  
Rocky Flats Office  
P.O. Box 928  
Golden, CO 80402-0928

Dear Beth:

Thank you for the opportunity to comment on the Final Proposed Subsurface Interim Measure/Interim Remedial Action Plan/Environmental Assessment and Decision Document for Operable Unit 2 (OU2).

The City of Westminster is concerned that remediation plans for OU2 no longer include the collection and treatment of seeps in the Woman Creek drainage basin, but instead, the regulatory agencies propose that subsurface water be pumped from three areas within OU2, and treated at the South Walnut Creek Treatment System. Westminster understands that information gained during this process will aid in the selection and design of the final cleanup remedy, however, this procedure will most likely take years to complete, and meanwhile, the seeps continue to flow uncontrolled into Woman Creek.

The South Walnut Creek Treatment System and the 881 Hillside Groundwater Treatment System are newly constructed treatment facilities designed with the purpose of treating contaminants specific to their areas. Westminster has not received any test results which demonstrate the ability of those facilities to adequately remove contaminants, which are believed to be present under the 903 Pad Area. Since the success of those treatment facilities in removing plutonium and americium is not proven, and those treatment facilities were designed to treat contaminated water with a somewhat different water chemistry, the introduction of contaminants which those systems cannot adequately remove could jeopardize water quality in Woman Creek and Standley Lake. Westminster recommends that the extracted subsurface water should be delivered to Building 231B GAC Absorption System/Building 374 Evaporation System which may be better suited to treat the level and type of radionuclides extracted from under the 903 Pad Area.

In regard to the Applicable or Relevant and Appropriate Requirements (ARARs) issue, the City of Westminster supports the Colorado Department of Health's position on ARARs as documented in their March 12 letter to the United States Department of Energy. Westminster believes that the site specific standards as adopted by the Water Quality Control Commission meet the ARAR

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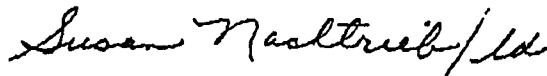
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criteria and should be included as cleanup ARARs. However, if in the future, a stream classification and/or standard is changed, then the ARAR should reflect that change

The City of Westminster is committed to protecting the water quality in Standley Lake. Downstream users have supported Westminster's efforts to isolate Standley Lake from the Rocky Flats Plant through implementation of the Option B Project which includes construction of the Standley Lake Diversion Project and the Woman Creek Reservoir. Downstream users view that the Standley Lake Diversion Project, in conjunction with the entire Option B Project, provides protection for the South Platte River. It is essential that the Standley Lake Diversion Project and the Woman Creek Reservoir be in place to isolate Standley Lake, and thus protect downstream users, from an accidental release of contaminants from current or future activities at the Rocky Flats Plant. Thus, the City of Westminster urges the Department to accelerate the funding of the Option B Project so that water quality protection efforts may more quickly be put in place.

Sincerely,

A handwritten signature in cursive script, reading "Susan Nachtrieb", followed by a stylized flourish or initial.

Susan Nachtrieb  
Water Quality Coordinator

cc: Ron Hellbusch, Director of Public Works/Utilities